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January 24, 2017

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778

Dear Ms. Dortch:

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network ("Trinity Broadcasting"), by undersigned counsel, respectfully submits this reply in opposition to the Petition for Rulemaking ("Petition") filed by Fixed Wireless Communications Coalition, Inc. ("FWCC") in the above-captioned proceeding.¹ Trinity Broadcasting fully supports the satellite industry's opposition to the rule changes proposed by the FWCC.² In particular, Trinity Broadcasting agrees with Intelsat that adopting FWCC's radical proposal to eliminate the Commission's long-standing and highly successful full-band, full-arc earth station licensing policy would critically harm the Fixed-Satellite Service ("FSS") customers that this flexible policy was designed to protect. As explained below, Trinity Broadcasting is such a customer. Accordingly, Trinity Broadcasting respectfully requests that the Commission deny or dismiss FWCC's Petition.

Trinity Broadcasting was founded in 1973, and was one of the first broadcasters in the industry to use satellite service, specifically C-Band service, to provide nationwide service and enhance its local service in the public interest. Its station groups and multiple free-to-the-home network services have helped build a healthier and more competitive broadcast television marketplace,

¹ Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778 (filed Oct. 11, 2016).

² See, e.g., Opposition of Intelsat License LLC, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of the Satellite Industry Association, RM-11778 (filed Jan. 9, 2017); Petition to Dismiss or Deny of SES Americom, Inc. (filed Jan. 9, 2017); Opposition of EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC, RM-11778 (filed Jan. 9, 2017).

and none of that would have been possible without the C-Band satellite service. Trinity Broadcasting's near 45-year service has manifestly enhanced the public interest, and served an overarching First Amendment value by expanding viewer choices and options.³ Today Trinity Broadcasting provides six multicast free-to-the-home non-profit program services. These multicast streams include "The Trinity Broadcasting Network," "Smile of a Child TV," "The Hillsong Channel" (formerly "The Church Channel"), "Enlace USA," "TBN Salsa," and "JUCE TV." In addition to its flagship broadcast service, "The Trinity Broadcasting Network," Trinity was able to develop these additional multicast video programming streams to better serve the unique interests of a wide variety of audiences.

"Enlace USA," for example, serves the religious programming needs and interests of Spanish-speaking viewers. "TBN Salsa" provides English and Spanish language programming serving the wider Hispanic community and culture. "Smile of a Child TV" is a service providing significant Children's educational programming. "The Hillsong Channel" crosses denominational lines across America, providing access to the best and most popular church services, along with live events and concerts. Finally, "JUCE TV" is a Christian programming network designed with the 13-29 year old age group in mind, combining music video programming, sketch and stand-up comedy, talk shows, action- and extreme-sports programming, and other subject matter of interest to teens and young adults. Each of these multicast programming streams would not have been possible without its satellite service.

Trinity Broadcasting believes that any move that would restrict its uplinks and downlinks to only a specific frequency and orbital location, rather than be licensed as it is today to a full-band, full-arc access, would be very harmful to its operations and continued operation in the 3700-4200 MHz band. The effect would not only be to Trinity Broadcasting's main network uplink in Tustin, California, but also to each downlink at the 37 television stations it services nationwide. If Trinity Broadcasting was limited to only one frequency and orbital orientation associated with each license, it would create an inability to protect itself against future encroachment and interference when a terrestrial licensee is licensed for C-band spectrum. This would also greatly undermine Trinity Broadcasting's ability to change primary satellites or transponders following a catastrophic failure, which has happened over the years. Indeed, changes in satellites and transponders has been commonplace over the more than 40 years Trinity Broadcasting has been operating, and the proposed changes would effectively render the use of satellite transmission and reception in the 3700-4200 MHz band less reliable or practical for future use. In the last 30 years, for example, Trinity has had to change spacecraft on at least five occasions and

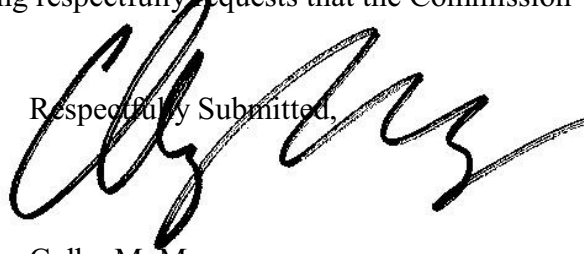
³ As the Supreme Court noted more than seventy years ago, the First Amendment's "assumption that the widest possible dissemination of information from diverse value and antagonistic sources" promotes a free society. *Associated Press v. United States*, 326 U.S. 1, 20 (1945). This same view was confirmed in *Turner Broadcasting System, Inc. v. FCC*, 520 U.S. 180, 189 (1997), holding that "promoting the widespread dissemination of information from a multiplicity of sources" is an important government interest, and a core First Amendment value.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
January 24, 2017
page 3

transponders at least eight times. Had the current proposal been in place, those changes would not have been accommodated or even possible.

FWCC's proposal would no longer allow for full-frequency, full-arc licenses and would, absent a waiver, require an FSS antenna licensee to file a license modification application or request for special temporary prior to transmitting on any frequency or to a satellite in any orbital location not explicitly provided in the applicable license. Because the very nature of video contribution/distribution operations requires that FSS customers have the flexibility to move to alternative satellite capacity and to coordinate their operational parameters on extremely short notice, the rigid licensing regime proposed by FWCC in its Petition would negatively impact those operations. Accordingly, Trinity Broadcasting respectfully requests that the Commission deny or dismiss FWCC's Petition.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Colby M. May', is written over the 'Respectfully Submitted,' text.

Colby M. May
Attorney for Trinity Christian Center
Of Santa Ana, Inc.

CMM/gmc
cc: Ben Miller
Attached Certificate of Service

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
January 24, 2017
page 4

CERTIFICATE OF SERVICE

I, Glinda M. Corbin, Office Manager of Colby M. May, Esq., PC, hereby certify that on this 24th day of January, 2017, I caused a true and correct copy of the foregoing to be served by first-class mail, postage prepaid, on:

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
January 24, 2017
page 5

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